

1 ELLEN R. PECK, ESQ. (STATE BAR NO. 88252)
2 2410 CRESTVIEW ESTATES PLACE
3 ESCONDIDO, CALIFORNIA 92027
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FILED

MAR - 7 2013

Attorney for Respondent, Rodney Kent Worrel

**STATE BAR COURT CLERK'S OFFICE
SAN FRANCISCO**

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8
9 THE STATE BAR COURT
10 OF THE STATE BAR OF CALIFORNIA
11 HEARING DEPARTMENT – LOS ANGELES
12

13 In the Matter of

14
15 RODNEY KENT WORREL,
16 No. 51857,

17 A Member of the State Bar of California.
18
19

Case Nos. 12-O-17036, 12-O-17255, 12-
O-17493, 12-O-18164, 12-O-18234, 13-O-
10067, 13-O-10159 - LMA

RESPONSE TO NOTICE OF
DISCIPLINARY CHARGES

20 Respondent, Rodney Kent Worrel responds to the allegations set forth in the Notice
21 of Disciplinary Charges ("Notice") on file herein, by admitting denying and alleging as
22 follows:

23 The name and address of Respondent's counsel of record is:

24
25 ELLEN R. PECK, ESQ.
26 2410 CRESTVIEW ESTATES PLACE
27 ESCONDIDO, CALIFORNIA 92027
28

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1 All further pleadings in this matter should be directed to Respondent's counsel at this
2 address.

3 1. Respondent **admits** to the truth of all of the allegations set forth in paragraph
4 1. of the Notice, except that he was admitted in 1972 not 1072.

5 COUNT ONE

6 2. Respondent currently lacks information sufficient to form a belief as to the
7 truth of the matters alleged in paragraph 2 of the Notice and, on that basis, denies those
8 allegations.

9 3. Respondent currently lacks information sufficient to form a belief as to the
10 truth of the matters alleged in paragraph 3 of the Notice and, on that basis, denies those
11 allegations.

12 4. Respondent currently lacks information sufficient to form a belief as to the
13 truth of the matters alleged in paragraph 4 of the Notice and, on that basis, denies those
14 allegations.

15 5. Respondent currently lacks information sufficient to form a belief as to the
16 truth of the matters alleged in paragraph 5 of the Notice and, on that basis, denies those
17 allegations.

18 6. Respondent currently lacks information sufficient to form a belief as to the
19 truth of the matters alleged in paragraph 6 of the Notice and, on that basis, denies those
20 allegations.

21 7. Respondent currently lacks information sufficient to form a belief as to the
22 truth of the matters alleged in paragraph 7 of the Notice and, on that basis, denies those
23 allegations.

24 8. Respondent currently lacks information sufficient to form a belief as to the
25 truth of the matters alleged in paragraph 8 of the Notice and, on that basis, denies those
26 allegations.

27 COUNT TWO

28 9. Respondent currently lacks information sufficient to form a belief as to the

1 truth of the matters alleged in paragraph 9 of the Notice and, on that basis, denies those
2 allegations.

3 10. Respondent currently lacks information sufficient to form a belief as to the
4 truth of the matters alleged in paragraph 10 of the Notice and, on that basis, denies those
5 allegations.

6 11. Respondent currently lacks information sufficient to form a belief as to the
7 truth of the matters alleged in paragraph 11 of the Notice and, on that basis, denies those
8 allegations.

9 12. Respondent currently lacks information sufficient to form a belief as to the
10 truth of the matters alleged in paragraph 12 of the Notice and, on that basis, denies those
11 allegations.

12 13. Respondent currently lacks information sufficient to form a belief as to the
13 truth of the matters alleged in paragraph 13 of the Notice and, on that basis, denies those
14 allegations.

15 **COUNT THREE**

16 14. Respondent currently lacks information sufficient to form a belief as to the
17 truth of the matters alleged in paragraph 14 of the Notice and, on that basis, denies those
18 allegations.

19 15. Respondent currently lacks information sufficient to form a belief as to the
20 truth of the matters alleged in paragraph 15 of the Notice and, on that basis, denies those
21 allegations.

22 16. Respondent currently lacks information sufficient to form a belief as to the
23 truth of the matters alleged in paragraph 16 of the Notice and, on that basis, denies those
24 allegations.

25 17. Respondent currently lacks information sufficient to form a belief as to the
26 truth of the matters alleged in paragraph 17 of the Notice and, on that basis, denies those
27 allegations.

28 18. Respondent currently lacks information sufficient to form a belief as to the

1 truth of the matters alleged in paragraph 18 of the Notice and, on that basis, denies those
2 allegations.

3 **COUNT FOUR**

4 19. Respondent currently lacks information sufficient to form a belief as to the
5 truth of the matters alleged in paragraph 19 of the Notice and, on that basis, denies those
6 allegations.

7 20. Respondent currently lacks information sufficient to form a belief as to the
8 truth of the matters alleged in paragraph 20 of the Notice and, on that basis, denies those
9 allegations.

10 21. Respondent currently lacks information sufficient to form a belief as to the
11 truth of the matters alleged in paragraph 21 of the Notice and, on that basis, denies those
12 allegations.

13 22. Respondent currently lacks information sufficient to form a belief as to the
14 truth of the matters alleged in paragraph 22 of the Notice and, on that basis, denies those
15 allegations.

16 23. Respondent currently lacks information sufficient to form a belief as to the
17 truth of the matters alleged in paragraph 23 of the Notice and, on that basis, denies those
18 allegations.

19 24. Respondent currently lacks information sufficient to form a belief as to the
20 truth of the matters alleged in paragraph 24 of the Notice and, on that basis, denies those
21 allegations.

22 **COUNT FIVE**

23 25. Respondent currently lacks information sufficient to form a belief as to the
24 truth of the matters alleged in paragraph 25 of the Notice and, on that basis, denies those
25 allegations.

26 26. Respondent currently lacks information sufficient to form a belief as to the
27 truth of the matters alleged in paragraph 26 of the Notice and, on that basis, denies those
28 allegations.

27. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 27 of the Notice and, on that basis, denies those allegations.

28. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 28 of the Notice and, on that basis, denies those allegations.

29. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 29 of the Notice and, on that basis, denies those allegations.

COUNT SIX

30. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 30 of the Notice and, on that basis, denies those allegations.

31. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 31 of the Notice and, on that basis, denies those allegations.

32. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 32 of the Notice and, on that basis, denies those allegations.

33. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 33 of the Notice and, on that basis, denies those allegations.

34. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 34 of the Notice and, on that basis, denies those allegations.

35. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 35 of the Notice and, on that basis, denies those allegations.

COUNT SEVEN

36. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 36 of the Notice and, on that basis, denies those allegations.

37. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 37 of the Notice and, on that basis, denies those allegations.

38. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 38 of the Notice and, on that basis, denies those allegations. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 38 of the Notice and, on that basis, denies those allegations.

39. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 39 of the Notice and, on that basis, denies those allegations.

40. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 40 of the Notice and, on that basis, denies those allegations.

COUNT EIGHT

41. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 41 of the Notice and, on that basis, denies those allegations.

42. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 42 of the Notice and, on that basis, denies those allegations.

43. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 43 of the Notice and, on that basis, denies those allegations.

44. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 44 of the Notice and, on that basis, denies those allegations.

45. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 45 of the Notice and, on that basis, denies those allegations.

46. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 46 of the Notice and, on that basis, denies those allegations.

COUNT NINE

47. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 47 of the Notice and, on that basis, denies those allegations.

48. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 48 of the Notice and, on that basis, denies those allegations.

49. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 49 of the Notice and, on that basis, denies those allegations.

50. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 50 of the Notice and, on that basis, denies those allegations.

51. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 51 of the Notice and, on that basis, denies those allegations.

52. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 52 of the Notice and, on that basis, denies those allegations.

53. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 53 of the Notice and, on that basis, denies those allegations.

54. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 54 of the Notice and, on that basis, denies those allegations.

COUNT TEN

55. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 55 of the Notice and, on that basis, denies those allegations.

56. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 56 of the Notice and, on that basis, denies those allegations.

57. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 57 of the Notice and, on that basis, denies those allegations.

58. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 58 of the Notice and, on that basis, denies those allegations.

59. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 59 of the Notice and, on that basis, denies those allegations.

60. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 60 of the Notice and, on that basis, denies those allegations.

COUNT ELEVEN

61. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 61 of the Notice and, on that basis, denies those

1 allegations.

2 62. Respondent currently lacks information sufficient to form a belief as to the
3 truth of the matters alleged in paragraph 62 of the Notice and, on that basis, denies those
4 allegations.

5 63. Respondent currently lacks information sufficient to form a belief as to the
6 truth of the matters alleged in paragraph 63 of the Notice and, on that basis, denies those
7 allegations.

8 64. Respondent currently lacks information sufficient to form a belief as to the
9 truth of the matters alleged in paragraph 64 of the Notice and, on that basis, denies those
10 allegations.

11 65. Respondent currently lacks information sufficient to form a belief as to the
12 truth of the matters alleged in paragraph 65 of the Notice and, on that basis, denies those
13 allegations.

14 **COUNT TWELVE**

15 66. Respondent currently lacks information sufficient to form a belief as to the
16 truth of the matters alleged in paragraph 66 of the Notice and, on that basis, denies those
17 allegations.

18 67. Respondent currently lacks information sufficient to form a belief as to the
19 truth of the matters alleged in paragraph 67 of the Notice and, on that basis, denies those
20 allegations.

21 68. Respondent currently lacks information sufficient to form a belief as to the
22 truth of the matters alleged in paragraph 68 of the Notice and, on that basis, denies those
23 allegations.

24 69. Respondent currently lacks information sufficient to form a belief as to the
25 truth of the matters alleged in paragraph 69 of the Notice and, on that basis, denies those
26 allegations.

27 70. Respondent currently lacks information sufficient to form a belief as to the
28 truth of the matters alleged in paragraph 70 of the Notice and, on that basis, denies those

1 allegations.

2 71. Respondent currently lacks information sufficient to form a belief as to the
3 truth of the matters alleged in paragraph 71 of the Notice and, on that basis, denies those
4 allegations.

5 **COUNT THIRTEEN**

6 72. Respondent currently lacks information sufficient to form a belief as to the
7 truth of the matters alleged in paragraph 72 of the Notice and, on that basis, denies those
8 allegations.

9 73. Respondent currently lacks information sufficient to form a belief as to the
10 truth of the matters alleged in paragraph 73 of the Notice and, on that basis, denies those
11 allegations.

12 74. Respondent currently lacks information sufficient to form a belief as to the
13 truth of the matters alleged in paragraph 74 of the Notice and, on that basis, denies those
14 allegations.

15 75. Respondent currently lacks information sufficient to form a belief as to the
16 truth of the matters alleged in paragraph 75 of the Notice and, on that basis, denies those
17 allegations.

18 76. Respondent currently lacks information sufficient to form a belief as to the
19 truth of the matters alleged in paragraph 76 of the Notice and, on that basis, denies those
20 allegations.

21 77. Respondent currently lacks information sufficient to form a belief as to the
22 truth of the matters alleged in paragraph 77 of the Notice and, on that basis, denies those
23 allegations.

24 **COUNT FOURTEEN**

25 78. Respondent currently lacks information sufficient to form a belief as to the
26 truth of the matters alleged in paragraph 78 of the Notice and, on that basis, denies those
27 allegations.

28 79. Respondent currently lacks information sufficient to form a belief as to the

1 truth of the matters alleged in paragraph 79 of the Notice and, on that basis, denies those
2 allegations.

3 80. Respondent currently lacks information sufficient to form a belief as to the
4 truth of the matters alleged in paragraph 80 of the Notice and, on that basis, denies those
5 allegations.

6 81. Respondent currently lacks information sufficient to form a belief as to the
7 truth of the matters alleged in paragraph 81 of the Notice and, on that basis, denies those
8 allegations.

9 82. Respondent currently lacks information sufficient to form a belief as to the
10 truth of the matters alleged in paragraph 82 of the Notice and, on that basis, denies those
11 allegations.

12 **COUNT FIFTEEN**

13 83. Respondent currently lacks information sufficient to form a belief as to the
14 truth of the matters alleged in paragraph 83 of the Notice and, on that basis, denies those
15 allegations:

16 84. Respondent currently lacks information sufficient to form a belief as to the
17 truth of the matters alleged in paragraph 84 of the Notice and, on that basis, denies those
18 allegations.

19 85. Respondent currently lacks information sufficient to form a belief as to the
20 truth of the matters alleged in paragraph 85 of the Notice and, on that basis, denies those
21 allegations.

22 86. Respondent currently lacks information sufficient to form a belief as to the
23 truth of the matters alleged in paragraph 86 of the Notice and, on that basis, denies those
24 allegations.

25 87. Respondent currently lacks information sufficient to form a belief as to the
26 truth of the matters alleged in paragraph 87 of the Notice and, on that basis, denies those
27 allegations.

28 **COUNT SIXTEEN**

88. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 88 of the Notice and, on that basis, denies those allegations.

89. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 89 of the Notice and, on that basis, denies those allegations.

90. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 90 of the Notice and, on that basis, denies those allegations.

91. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 91 of the Notice and, on that basis, denies those allegations.

92. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 92 of the Notice and, on that basis, denies those allegations.

93. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 93 of the Notice and, on that basis, denies those allegations.

COUNT SEVENTEEN

94. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 94 of the Notice and, on that basis, denies those allegations.

95. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 95 of the Notice and, on that basis, denies those allegations.

96. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 96 of the Notice and, on that basis, denies those allegations.

97. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 97 of the Notice and, on that basis, denies those allegations.

98. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 98 of the Notice and, on that basis, denies those allegations.

COUNT SIXTEEN

99. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 99 of the Notice and, on that basis, denies those allegations.

100. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 100 of the Notice and, on that basis, denies those allegations.

101. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 101 of the Notice and, on that basis, denies those allegations.

102. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 102 of the Notice and, on that basis, denies those allegations.

103. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 103 of the Notice and, on that basis, denies those allegations.

COUNT NINETEEN

104. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 104 of the Notice and, on that basis, denies those allegations.

105. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 105 of the Notice and, on that basis, denies those

1 allegations.

2 106. Respondent currently lacks information sufficient to form a belief as to the
3 truth of the matters alleged in paragraph 106 of the Notice and, on that basis, denies those
4 allegations.

5 107. Respondent currently lacks information sufficient to form a belief as to the
6 truth of the matters alleged in paragraph 107 of the Notice and, on that basis, denies those
7 allegations.

8 108. Respondent currently lacks information sufficient to form a belief as to the
9 truth of the matters alleged in paragraph 108 of the Notice and, on that basis, denies those
10 allegations.

11 **COUNT TWENTY**

12 109. Respondent currently lacks information sufficient to form a belief as to the
13 truth of the matters alleged in paragraph 109 of the Notice and, on that basis, denies those
14 allegations.

15 110. Respondent currently lacks information sufficient to form a belief as to the
16 truth of the matters alleged in paragraph 110 of the Notice and, on that basis, denies those
17 allegations.

18 111. Respondent currently lacks information sufficient to form a belief as to the
19 truth of the matters alleged in paragraph 111 of the Notice and, on that basis, denies those
20 allegations.

21 112. Respondent currently lacks information sufficient to form a belief as to the
22 truth of the matters alleged in paragraph 112 of the Notice and, on that basis, denies those
23 allegations.

24 113. Respondent currently lacks information sufficient to form a belief as to the
25 truth of the matters alleged in paragraph 113 of the Notice and, on that basis, denies those
26 allegations.

27 114. Respondent currently lacks information sufficient to form a belief as to the
28 truth of the matters alleged in paragraph 114 of the Notice and, on that basis, denies those

1 allegations.

2 **COUNT TWENTY-ONE**

3 115. Respondent currently lacks information sufficient to form a belief as to the
4 truth of the matters alleged in paragraph 115 of the Notice and, on that basis, denies those
5 allegations.

6 116. Respondent currently lacks information sufficient to form a belief as to the
7 truth of the matters alleged in paragraph 116 of the Notice and, on that basis, denies those
8 allegations.

9 117. Respondent currently lacks information sufficient to form a belief as to the
10 truth of the matters alleged in paragraph 117 of the Notice and, on that basis, denies those
11 allegations.

12 118. Respondent currently lacks information sufficient to form a belief as to the
13 truth of the matters alleged in paragraph 118 of the Notice and, on that basis, denies those
14 allegations.

15 119. Respondent currently lacks information sufficient to form a belief as to the
16 truth of the matters alleged in paragraph 119 of the Notice and, on that basis, denies those
17 allegations.

18 120. Respondent currently lacks information sufficient to form a belief as to the
19 truth of the matters alleged in paragraph 120 of the Notice and, on that basis, denies those
20 allegations.

21 121. Respondent currently lacks information sufficient to form a belief as to the
22 truth of the matters alleged in paragraph 121 of the Notice and, on that basis, denies those
23 allegations.

24 **COUNT TWENTY-TWO**

25 122. Respondent currently lacks information sufficient to form a belief as to the
26 truth of the matters alleged in paragraph 122 of the Notice and, on that basis, denies those
27 allegations.

28 123. Respondent currently lacks information sufficient to form a belief as to the

1 truth of the matters alleged in paragraph 123 of the Notice and, on that basis, denies those
2 allegations.

3 124. Respondent currently lacks information sufficient to form a belief as to the
4 truth of the matters alleged in paragraph 124 of the Notice and, on that basis, denies those
5 allegations.

6 125. Respondent currently lacks information sufficient to form a belief as to the
7 truth of the matters alleged in paragraph 125 of the Notice and, on that basis, denies those
8 allegations.

9 126. Respondent currently lacks information sufficient to form a belief as to the
10 truth of the matters alleged in paragraph 126 of the Notice and, on that basis, denies those
11 allegations.

12 **COUNT TWENTY-THREE**

13 127. Respondent currently lacks information sufficient to form a belief as to the
14 truth of the matters alleged in paragraph 127 of the Notice and, on that basis, denies those
15 allegations.

16 128. Respondent currently lacks information sufficient to form a belief as to the
17 truth of the matters alleged in paragraph 128 of the Notice and, on that basis, denies those
18 allegations.

19 129. Respondent currently lacks information sufficient to form a belief as to the
20 truth of the matters alleged in paragraph 129 of the Notice and, on that basis, denies those
21 allegations.

22 130. Respondent currently lacks information sufficient to form a belief as to the
23 truth of the matters alleged in paragraph 130 of the Notice and, on that basis, denies those
24 allegations.

25 131. Respondent currently lacks information sufficient to form a belief as to the
26 truth of the matters alleged in paragraph 131 of the Notice and, on that basis, denies those
27 allegations.

28 **COUNT TWENTY-FOUR**

1 132. Respondent currently lacks information sufficient to form a belief as to the
2 truth of the matters alleged in paragraph 132 of the Notice and, on that basis, denies those
3 allegations.

4 133. Respondent currently lacks information sufficient to form a belief as to the
5 truth of the matters alleged in paragraph 133 of the Notice and, on that basis, denies those
6 allegations.

7 134. Respondent currently lacks information sufficient to form a belief as to the
8 truth of the matters alleged in paragraph 134 of the Notice and, on that basis, denies those
9 allegations.

10 135. Respondent currently lacks information sufficient to form a belief as to the
11 truth of the matters alleged in paragraph 135 of the Notice and, on that basis, denies those
12 allegations.

13 136. Respondent currently lacks information sufficient to form a belief as to the
14 truth of the matters alleged in paragraph 136 of the Notice and, on that basis, denies those
15 allegations.

16 137. Respondent currently lacks information sufficient to form a belief as to the
17 truth of the matters alleged in paragraph 137 of the Notice and, on that basis, denies those
18 allegations.

19 **COUNT TWENTY-FIVE**

20 138. Respondent currently lacks information sufficient to form a belief as to the
21 truth of the matters alleged in paragraph 138 of the Notice and, on that basis, denies those
22 allegations.

23 139. Respondent currently lacks information sufficient to form a belief as to the
24 truth of the matters alleged in paragraph 139 of the Notice and, on that basis, denies those
25 allegations.

26 140. Respondent currently lacks information sufficient to form a belief as to the
27 truth of the matters alleged in paragraph 140 of the Notice and, on that basis, denies those
28 allegations.

141. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 141 of the Notice and, on that basis, denies those allegations.

142. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 142 of the Notice and, on that basis, denies those allegations.

143. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 143 of the Notice and, on that basis, denies those allegations.

COUNT TWENTY-SIX

144. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 144 of the Notice and, on that basis, denies those allegations.

145. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 145 of the Notice and, on that basis, denies those allegations.

146. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 146 of the Notice and, on that basis, denies those allegations.

147. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 147 of the Notice and, on that basis, denies those allegations.

148. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 148 of the Notice and, on that basis, denies those allegations.

149. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 149 of the Notice and, on that basis, denies those allegations.

COUNT TWENTY-SEVEN

150. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 150 of the Notice and, on that basis, denies those allegations.

151. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 151 of the Notice and, on that basis, denies those allegations.

152. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 152 of the Notice and, on that basis, denies those allegations.

153. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 153 of the Notice and, on that basis, denies those allegations.

154. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 154 of the Notice and, on that basis, denies those allegations.

COUNT TWENTY-EIGHT

155. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 155 of the Notice and, on that basis, denies those allegations.

156. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 156 of the Notice and, on that basis, denies those allegations.

157. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 157 of the Notice and, on that basis, denies those allegations.

158. Respondent currently lacks information sufficient to form a belief as to the truth of the matters alleged in paragraph 158 of the Notice and, on that basis, denies those

1 allegations.

2 159. Respondent currently lacks information sufficient to form a belief as to the
3 truth of the matters alleged in paragraph 159 of the Notice and, on that basis, denies those
4 allegations.

5 160. Respondent currently lacks information sufficient to form a belief as to the
6 truth of the matters alleged in paragraph 160 of the Notice and, on that basis, denies those
7 allegations.

8 DATED: March 6, 2013

Respectfully submitted,

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10 

11 Ellen R. Peck, Attorney for Respondent,
12 Rodney Kent Worrel, Esq.
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AFFIDAVIT OF SERVICE BY MAIL

Case Nos. 12-O-17036, 12-O-17255, 12-O-17493, 12-O-18164, 12-O-18234, 13-O-10067, 13-O-10159 - LMA

I, the undersigned, declare that: I am over the age of eighteen (18) years; my residence address is 2172 Caneridge Dr. SW, Marietta, Georgia 30064 - 4362; I am not a party to the within action; I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service ; the below document was deposited with the United States Postal Service on this date in the ordinary course of business and was addressed to the persons at the address set forth below on the date set forth below and was placed for deposit in the United States Postal Service mailbox at this residence, a true and correct copy of the within

RESPONSE TO NOTICE OF DISCIPLINARY CHARGES

in a sealed envelope placed for collection and mailing at Marietta, Georgia on the date shown below, addressed to:

Jayne Kim, Chief Trial Counsel
Joseph R. Carlucci, Depty. Chief Trial Counsel
Susan I. Kagan, Asst. Chief Trial Counsel
Susan Chan, Senior Trial Counsel
Suzan J. Anderson, Senior Trial Counsel
State Bar of California
180 Howard Street
San Francisco, California 94105-2209

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed at Marietta, Cobb County, Georgia, on the date shown below.

Dated:

3/6/2013

SIGNED:

Leslie P McNely

Leslie P. McNely, Declarant